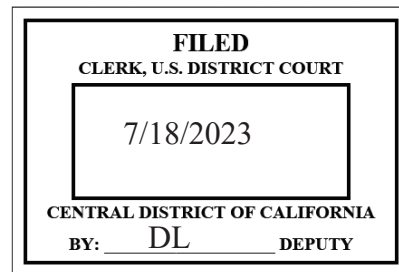


## UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

Juan Carlos Cruz Ramos,  
David Cruz Hernandez,  
Berta Montano Jimenez,

Defendant(s)

Case No. 2:23-MJ-3586

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2022 to July 17, 2023 in the county of Los Angeles in the Central District of California, the defendant(s) violated:

*Code Section*

18 U.S.C. §§ 371, 933

*Offense Description*

Conspiracy to Traffic Firearms

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/S/

Complainant's signature

Victoria Scott, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/18/2023

City and state: Los Angeles, California

A handwritten signature in black ink that reads "Rozella A. Oliver".

Judge's signature

Hon. Rozella A. Oliver, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Victoria Scott, being duly sworn, declare and state as follows:

**I. INTRODUCTION**

1. I am a Special Agent with the United States Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI") in Los Angeles, California, and I have been so employed since June 2019. I am currently assigned to HSI Ventura, which is tasked with investigating federal crimes involving smuggling of narcotics, weapons, and other types of contraband, financial crimes, immigration crimes, child exploitation, cybercrimes, human rights violations and human smuggling, and various other violations of immigration and customs laws. I have received both formal and informal training around smuggling crimes.

2. As an HSI agent, I have investigated complex criminal conspiracies involving drug and weapons trafficking, financial fraud, immigration and visa fraud, organized crime, and money laundering. In relation to the investigation of these cases, I have led and/or participated in the execution of search warrants to seize evidence of violations of federal law and arrest warrants to apprehend individuals who commit such violations. I have also participated in many aspects of criminal investigations including the issuance of subpoenas, reviewing evidence, conducting physical and electronic surveillance, working with informants, interviewing witnesses, executing search and arrest warrants, monitoring consensually recorded

meetings and telephone calls, and conducting court-authorized interception of wire communications.

## **II. PURPOSE OF AFFIDAVIT**

3. This affidavit is made in support of a criminal complaint against and arrest warrants for JUAN CARLOS CRUZ RAMOS, currently living under the identity "Ivan Cortes Ramirez" ("CRUZ RAMOS"); DAVID CRUZ HERNANDEZ ("CRUZ HERNANDEZ"); and BERTA MONTANO JIMENEZ ("MONTANO JIMENEZ"), for a violation of 18 U.S.C. § 371 (Conspiracy to Traffic Firearms).

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrants and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

## **III. SUMMARY OF PROBABLE CAUSE**

5. Surveillance video, GPS data and toll records from the targets' phones, and other evidence shows that there is probable cause that CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ conspired with each other and others to traffic firearms from California, where they reside, to Mexico from at least May 2022 to at least June 2023 using the same set of sender and recipient names, return addresses, recipient addresses, and phone numbers on invoices for the firearm shipments. To date, law enforcement

has seized 86 firearms connected to the conspiracy, including 70 firearms from a seizure at the Laredo, Texas Port of Entry of April 12, 2023.

6. CCTV footage shows CRUZ RAMOS dropping off parcels with different freight forwarders on March 15, 2023, May 11, 2023, and June 14, 2023. The May and June parcels each contained five or six AR-15-style rifles. CRUZ RAMOS' fingerprints were on the shipping label of one of the March 15 packages and on the foil in which the May 11 rifles were wrapped, and his cell phones communicated with cell towers in the vicinity of the various freight forwarders on the days of the drops. Moreover, agents saw CRUZ RAMOS drop off a parcel on June 15 with MONTANO JIMENEZ, whose fingerprints were also on the foil wrapping of the May 11 rifles. In the last year and a half, MONTANO JIMENEZ has received at least \$26,000 in wire transfers from the area of Mexico to which the parcels were addressed. Agents also saw CRUZ RAMOS at CRUZ HERNANDEZ' residence on June 23, 2023, leaving with a white garbage bag filled with unknown items.

7. CCTV footage also shows CRUZ HERNANDEZ, in a vehicle registered in his name, dropping off two parcels on April 5, 2023 (later seized as part of the April 12 seizure) at the same freight forwarder that CRUZ RAMOS used on March 15, 2023. CRUZ HERNANDEZ also dropped of another parcel found to contain five AR-15-style rifles on May 17, 2023. The parcels were addressed to the same rotating set of recipients and addresses as the parcels shipped by CRUZ RAMOS and MONTANO JIMENEZ and other

parcels shipped by the same purported senders. CRUZ HERNANDEZ' cell phone communicated with cell towers in the vicinity of CRUZ RAMOS' residence in the early morning of April 5 and May 17, as well as in the days just before CRUZ HERNANDEZ dropped off parcels on at least two other occasions between December 2022 and February 2023, before it communicated with cell towers in the vicinity of the various freight forwarders on the days of the drops.

8. My review of toll records also shows that the phone numbers associated with CRUZ RAMOS and CRUZ HERNANDEZ communicated with each other at least 321 times between February and June 2023. For example, the day of the April 5 shipment, CRUZ RAMOS and CRUZ HERNANDEZ' numbers communicated six times.

9. According to my review of AT&T toll records, GPS cell-site data, and Western Union and MoneyGram records, I believe CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ, as well as others, have conspired since at least May 2022 to send AR-15-style rifles to Oaxaca, Mexico, and used family members to facilitate the movement of at least \$100,000 across the border from Oaxaca, Mexico to California.

#### **IV. STATEMENT OF PROBABLE CAUSE**

##### **A. April 2023 Seizure of 70 Colt AR-15-Style Rifles and Magazines Sent from Canoga Park, California**

10. Based on my training and experience as an HSI Special Agent, my review of investigative reports, and the experiences related to me by fellow law enforcement officers who specialize in

weapons trafficking investigations, and my own participation in this investigation, I know the following:

11. On April 12, 2023, CBP officers at the Laredo Port of Entry inspected and seized eight parcels destined for Oaxaca, Mexico, and found a total of 70 Colt AR-15 5.56mm rifles and 70 Colt 5.56mm magazines concealed within foil, tape, and clothing. The parcels were all sent from Paqueteria Latina shipping service in Canoga Park, California.<sup>1</sup> The following is a photograph depicting the 70 firearms and magazines seized that day:



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<sup>1</sup> Paqueteria Latina is a family-owned freight forwarder with multiple locations in the Los Angeles area, including downtown Los Angeles, Northridge, Canoga Park, Richmond, and Fontana.

12. According to my review of Paqueteria Latina records and statements by Paqueteria Latina employees, an unknown female ("UF-1") dropped off two of the parcels from the April 12 seizure at the Canoga Park location on March 15, 2023 (the "March 15th parcels"). The sender's name listed on the invoice was "Juana Vasquez Garcia" of 5528 South Fortuna Street, Los Angeles, California,<sup>2</sup> with phone number 213-595-8603<sup>3</sup> (the "8603 number"). The invoice listed "Mauricio Vanegas" as the recipient, with address Manuel Sabino Crespo #67, Centro, Heroica Ciudad de Ejutla de Crespo, Oaxaca, Mexico, and phone +52-9515651614 (the "1614 number"). The invoice declared items such as clothes, shoes, blankets, forks, an iron, and other household goods. According to a Paqueteria employee, UF-1 paid in cash and did not provide any identification.

13. According to my review of Paqueteria Latina records and CCTV footage, a previously unknown male ("UM-1"), now believed to be CRUZ HERNANDEZ as explained below, dropped off four of parcels from the April 12 seizure at Paqueteria Latina Canoga Park on April 5, 2023 (the "April 5th parcels"). The sender's name listed on the invoice was "Jose Cruz Vasquez" of 5604 Compton Avenue, Los Angeles, California,<sup>4</sup> with phone number

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<sup>2</sup> According to Accurant and DMV databases, this address is not associated with anyone by that name or with any co-schemers.

<sup>3</sup> According to AT&T, the 8603 number is subscribed to third-party L. S. of 1220 ½ Soto Street, Los Angeles, California, who appears to be unconnected to the conduct described herein.

<sup>4</sup> According to Accurant and DMV databases, this address is not associated with anyone by that name or with any co-schemers. Moreover, it is a multi-unit structure.

520-312-8093<sup>5</sup> (the "8093 number"). The invoice listed "Adan Estevan Rios Martinez" as the recipient, with address 3 de Octubre #328, Centro, Miahuatlan de Porfirio Diaz, Oaxaca, Mexico, and phone +52-6641895980 (the "5980 number"). The invoice declared items such as clothes, shoes, a blender, forks, an iron, and other household goods. Then-UM-1 (who has now been identified as CRUZ HERNANDEZ) paid in cash and did not provide any identification.

14. According to my review of Paqueteria Latina records, both the "Juana Vasquez Garcia" and "Jose Cruz Vasquez" signatures on invoices appear to have been signed by the same individual.<sup>6</sup> Both the accounts<sup>7</sup> associated with alleged senders "Juana Vasquez Garcia" (the "Juana account") and "Jose Cruz Vasquez" (the "Jose account") appear on Paqueteria Latina invoices for several parcels destined for Oaxaca, Mexico using the same rotating set of identifiers and declared contents since at least May 2022:

a. the sender names of either "Jose Cruz Vasquez" or "Juana Vasquez Garcia";

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<sup>5</sup> According to AT&T records, the 8093 number is a prepaid phone subscribed to "Emida Customer Service." The user is later identified as CRUZ RAMOS, which is described in detail in Section E.

<sup>6</sup> Based on my review of the signatures, even though the names on the accounts are different and a different individual delivered the parcels, the signatures and handwriting on the invoices appear to be the same.

<sup>7</sup> For purposes of this affidavit, "accounts" refers to the set of invoices with the same sender identification, created in the Paqueteria Latina system. As the customer sends packages to new recipients or provides new contact information on their invoices, that information is added to the account and can link more than one account when information is shared.



b. the sender phone numbers 520-312-8093 (i.e., the 8093 number), 213-595-8603 (i.e., the 8603 number), or 213-361-5939 (i.e., the 5939 number);

c. the recipient names "Adan Esteban Rios Martinez" or "Mauricio Vanegas" or variations thereof; and

d. the recipient phone numbers 52-6641895980 or 52-9515451614.

**B. CRUZ RAMOS and CRUZ HERNANDEZ Are Connected to the March 15<sup>th</sup> and April 5<sup>th</sup> Parcels**

15. According to the CBP Laboratory, the shipping label of one of the March 15<sup>th</sup> parcels sent with the Juana account found to contain AR-15-style rifles bore one friction ridge impression identified as CRUZ RAMOS's fingerprint.<sup>8</sup>

16. I also queried the California Department of Motor Vehicles ("DMV") database regarding the black Ford sedan bearing California license plate 7TVV072 (the "Black Ford") depicted in Paqueteria Latina CCTV footage as used by the then-unknown male to drop off the four April 5, 2023 parcels. License plate 7TVV072 is registered to David CRUZ HERNANDEZ of 3908 Floral Drive, North Highlands, California (the "Floral Drive address"). I then compared the CCTV footage to the California driver's license photograph for CRUZ HERNANDEZ, which appear to depict

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<sup>8</sup> According to my review of law enforcement databases, California Department of Motor Vehicle records, and AT&T telephone records, I believe CRUZ RAMOS is currently residing in the United States without legal status, under the name Ivan Cortes Ramirez, who is a true person believed to reside in Mexico. CRUZ RAMOS appears to have acquired a California driver's license in Cortes Ramirez's name with CRUZ RAMOS' own photograph, registered a vehicle in Cortes Ramirez's name, and purchased a house in Sanger, California in Cortes Ramirez's name.

the same person, as later confirmed when CRUZ HERNANDEZ dropped off another parcel on May 17, 2023, explained below.

**C. GPS Cell-Site Data Connects the 8093 Number to the March 15<sup>th</sup> and April 5<sup>th</sup> Parcels and Other Unseized Parcels**

17. On May 4, 2023, I obtained a federal warrant for historical and prospective cell-site information signed by the Honorable Rozella A. Oliver, United States Magistrate Judge, for the 8603 and 8093 numbers, the two cell phones listed on the March 15<sup>th</sup> and April 5<sup>th</sup> parcel invoices, and believed to be used by CRUZ RAMOS, as explained below. See 2:23-MJ-02224.

18. According to my analysis of GPS cell-site data, on March 15, 2023, the 8093 number communicated with several cell phone towers from Sanger, California to Canoga Park, California for what appeared to be an approximately 30-minute stop in the vicinity of Paqueteria Latina. The 8093 number then communicated with several cell phone towers from Canoga Park, California to Gilroy, California and back to Sanger, California. Given CRUZ RAMOS' fingerprint on the label of one of the March 15 parcels and later cell site GPS analysis, surveillance, CCTV footage from a later drop at Global Cargo, and comparison with California driver's licenses as described below, I believe that the 8093 number is also associated with CRUZ RAMOS.

19. According to a Paqueteria Latina employee, a female using the 8603 number called to check the status of the April 5<sup>th</sup> parcels on April 15 and 19, 2023, and a male using the 8093 number called to check the status of the April 5<sup>th</sup> parcels on April 17, 18, 19, 22, and 25, 2023.

**D. User of the 8093 Number (CRUZ RAMOS) Sends Another Parcel with Six AR-15-Style Rifles from Pacoima, California on May 11, 2023**

20. According to my review of GPS cell-site data, on May 11, 2023, the 8093 number communicated with several cell phone towers from Sanger, California to Pacoima, California for what appeared to be a less-than-15-minute stop within a quarter-mile of Global Cargo in Pacoima, California.<sup>9</sup>

21. According to my review of Global Cargo records and CCTV footage, as well as the CCTV footage of a neighboring business, that same day, a then-unidentified male (later identified as CRUZ RAMOS) and a female, in a dark gray minivan,<sup>10</sup> dropped off one heavily-taped parcel at the Pacoima Global Cargo for shipment to Oaxaca, Mexico ("the May 11<sup>th</sup> parcel"). The sender information on the invoice listed a new name of "Martin Hernandez Cortez" and address 5604 Cotton Avenue, East Los Angeles, California, which according to my research, is not a valid address, with the 5939 number. The invoice listed the previously-used name of "Adan Esteban Rios Martinez"<sup>11</sup> as the parcel recipient, the previously-used address in Heroica Ciudad de Ejutla, Oaxaca, Mexico, and a new recipient phone number +52-

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<sup>9</sup> Global Cargo Paqueteria is another small freight-forwarding service with locations in Los Angeles and Redwood City, California, as well as Las Vegas, Nevada.

<sup>10</sup> HSI agents have reviewed pole camera footage of the vicinity around the Robinson Avenue address and saw what appears to be the same minivan parked at the Robinson Avenue location on July 11, 2023.

<sup>11</sup> Adan Esteban Rios Martinez is a true person, previously deported, and believed to reside in Mexico. The invoice from Paqueteria Latina appears to have listed a misspelling of "Esteban" as "Estevan," but the Global Cargo invoice listed the correct spelling.

9512391094 (the "1094 number"). On May 12, 2023, a trained gun detection dog, Traxx, alerted positively to the parcel for the presence of guns.

22. On May 15, 2023, I obtained a federal search warrant signed by the Honorable Maria A. Audero, United States Magistrate Judge, for the May 11<sup>th</sup> parcel (see 2:23-MJ-02463) and found six AR-15-style rifles concealed in foil, tape, and clothing within the parcel bound for Mexico.

23. The CBP Laboratory identified 21 latent prints on the foil wrapping the guns. Based on the preliminary laboratory analysis, 11 latent prints positively matched to CRUZ RAMOS, and 2 latent prints positively matched to MONTANO JIMENEZ. CRUZ RAMOS's prints were found on the foil and the sticky side of the tape holding the foil around the guns; MONTANO JIMENEZ's prints were found on the sticky side and non-sticky side of the tape holding the foil around the guns.

**E. CRUZ RAMOS Uses the Alias Ivan Cortes Ramirez, the Registered Owner of the Shields Avenue Address**

24. According to my review of GPS cell-site data for the 8093 number, law enforcement databases, and CCTV footage from Global Cargo on May 11, 2023, I located what appears to be the residence of the user of that number -- believed to be CRUZ RAMOS and/or MONTANO JIMENEZ, as explained below -- to be in the area just northwest of Sanger, California, a rural farming area east of Fresno, California.

25. On May 26, 2023, I obtained a federal warrant for historical and prospective cell-site information signed by the

Honorable Patricia Donahue, United States Magistrate Judge, for the 5939 number listed on the May 11<sup>th</sup> parcel invoice, as well as on previous invoices listed under the "Jose" and "Juana" accounts for parcels also going to Oaxaca from Paqueteria Latina. See 2:23-MJ-02763.

26. According to AT&T records, the 5939 number is subscribed to "Ivan Cortes Ramirez" ("Cortes Ramirez") at 1951 Ralph Avenue, Stockton, California (the "Ralph Avenue address").<sup>12</sup> However, according to Accurint, Cortes Ramirez's residence is listed as 11273 East Shields Avenue, Sanger, California (i.e., the Shields Avenue Address), in the vicinity of where the 8093 number has communicated with cell towers overnight.

27. According to my review of GPS cell-site data for the 5939 number, the movement of that user appears to be the same as the user of the 8093 number. The phones appear to be communicating with the same cell towers and are located in the same areas between April 26 and June 1, 2023. Therefore, I believe the users are the same person.

28. According to my review of law enforcement databases, Cortes Ramirez is a real person who is a Mexican national, with a date of birth of February 28, 1982, and no entries into the United States. On January 26, 2022, CBP encountered Cortes

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<sup>12</sup> According to Accurint, 1951 Ralph Avenue, Stockton, California is owned by Isabel Gonzalez since 2012. Based on my review of GPS cell site data, neither the 8093 number nor the 5939 number have communicated with cell towers near the Ralph Avenue address.

Ramirez with commercial merchandise at the Bota Port of Entry, but he was not allowed entry.

29. On May 26, 2023, HSI Fresno Special Agent ("SA") Dada Cheam saw a black Honda sedan at the Shields Avenue address, bearing California license plate 8XNV268 (the "black Honda"). According to the DMV, the black Honda is registered to Ivan Cortes Ramirez at the Ralph Avenue address--the subscriber address for the 5939 number.

30. California property records also indicate that the Shields Avenue address is owned in Cortes Ramirez's name.

31. I compared the California driver's license photograph for the person calling himself "Cortes Ramirez" and residing at 11273 East Shields Avenue, Sanger, California (i.e., the Shields Avenue address) to the January 2022 photograph taken at the Bota Port of Entry, and they do not appear to be the same person.<sup>13</sup>

32. My comparison of the California driver's license photograph of the person calling himself "Cortes Ramirez" with a driver's license photograph in the name of CRUZ RAMOS also leads me to believe that they visually appear to be the same person.<sup>14</sup> Accordingly, based on the above, I believe that the 5939 and 8093 numbers are used by CRUZ RAMOS.

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<sup>13</sup> My review of the photographs included noting the different face and eye shapes, different hairlines, and different lip sizes and shapes.

<sup>14</sup> According to the DMV, CRUZ RAMOS's driver's license photograph was taken in 2015, and the photograph for Cortes Ramirez was taken in 2020. My review of the facial features that were a match included hairline, a single freckle on the forehead, lines on the forehead, ear shape of each ear independently, lip size and shape, and facial structure.

33. Moreover, according to my review of law enforcement databases, I learned CRUZ RAMOS has been removed from the United States at least nine times between 2000 and 2016, including by being voluntarily returned on March 19, 2000 and February 27, 2003; through expedited removal on December 3, 2006, April 5, 2007, and February 5, 2008; and via a January 30, 2010 Final Order of Removal which led to his deportation and which was reinstated on December 8, 2012, March 10, 2013, August 18, 2013, and December 29, 2016, and after each reinstatement, CRUZ RAMOS was removed.

34. Based on my training and experience, I believe that CRUZ RAMOS is using the identity of Cortes Ramirez to evade law enforcement detection to engage in firearms trafficking and because he has no legal status in the United States.

**F. MONTANO JIMENEZ, the Listed Owner of the Robinson Avenue Address, Appears to be in a Long-Term Relationship with CRUZ RAMOS, who Travels between the Robinson Avenue and Shields Avenue Addresses Frequently**

35. According to my review of law enforcement databases, the Mexican phone -5980, listed on many of the outbound parcels, was listed on one of MONTANO JIMENEZ' denied visa applications as her home and work phone number in Oaxaca, Mexico. MONTANO JIMENEZ does not have a work permit or status in the United States. According to my review of Western Union records for MONTANO JIMENEZ, she is listed as having a residential address in Fresno, California, in addition to being listed on home purchase and financing documents as the owner of the Robinson Avenue address, and as the recipient of over \$26,000 in wire

transfers from Oaxaca, Mexico between January 2022 and April 2023 directed to MONTANO JIMENEZ at that address.

36. According to a review of law enforcement databases, MONTANO JIMENEZ shared the above Fresno residential address and financial accounts with a "Juan C. Cruz," who I believe to be the same person as CRUZ RAMOS,<sup>15</sup> as well as two adult children. The adult children share a combination of MONTANO JIMENEZ and CRUZ RAMOS' double last names (i.e., "Cruz Montano"), which, based on my training and experience, appears to indicate that CRUZ RAMOS and MONTANO JIMENEZ are in a committed relationship, if not legally married, and follows the naming convention traditionally used in Mexico for taking one name from each parent.

37. According to Accurant, MONTANO JIMENEZ is associated with the Robinson Avenue address, which appears to be a second residence for CRUZ RAMOS and MONTANO JIMENEZ because the DMV lists J.C.C.M., who, based on departmental database information, has stated that he is CRUZ RAMOS's and MONTANO JIMENEZ's son, as having a 2007 Chevrolet Tahoe currently registered to the Robinson Avenue address. Moreover, on May 30, 2023, SA Cheam saw the black Honda drive to the Robinson Avenue address. Based on surveillance, the windows of the Robinson Avenue address are boarded up.

38. Based on my analysis of GPS cell-site data for the 8093 and 5939 numbers, along with review of pole camera footage

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<sup>15</sup> According to the law enforcement databases, "Juan C. Cruz" and Juan Carlos CRUZ RAMOS share the same date of birth.



of the Shields Avenue address, both phones communicate with cell towers in a manner that reflects frequent travel between the Shields Avenue and Robinson Avenue addresses.

39. On June 5, 2023, I saw CRUZ RAMOS driving the black Honda, with MONTANO JIMENEZ in the passenger seat and a male juvenile in the backseat, to a Sanger area elementary school down the street from the Shields Avenue address. MONTANO JIMENEZ exited the vehicle to take the juvenile into the school, then returned to the black Honda, which left in the direction of the Shields Avenue address.

40. On June 22 and June 26, 2023, SA Cheam again located the black Honda parked at the Robinson Avenue address.<sup>16</sup>

**G. CRUZ HERNANDEZ, who Also Lacks Legal Status, Sends Another Parcel with 5 AR-15 Rifles from Redwood City, California on May 17, 2023**

41. On June 1, 2023, HSI Laredo located another parcel from Global Cargo Norte in Redwood City, California, at the DATT Freight, LLC warehouse in Laredo, Texas. The parcel was addressed to the same Oaxacan recipient address as previously seized parcels, with the same recipient phone number, and was found to contain five AR-15-style rifles concealed in foil, tape, and clothing.

42. Based on my review of GPS cell-site data for the 2129 number, on May 8, 2023, that cell phone was communicating with cell towers in a manner consistent with travel to Redwood City,

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<sup>16</sup> On additional occasions, the black Honda has been observed heading towards the Robinson Avenue Address, but as it is located on a cul-de-sac, following the vehicle down Robinson Avenue is not feasible.

California, where it communicated with cell towers in the vicinity of Global Cargo Norte that same day.<sup>17</sup> According to statements from Global Cargo Norte employees and Global Cargo CCTV footage, that same day, CRUZ HERNANDEZ and a juvenile male came to Global Cargo Norte and purchased an empty box matching the brand and dimensions of the box used for the May 17<sup>th</sup> parcel.

43. Based on my review of May 17, 2023 Global Cargo Norte records and CCTV footage, CCTV footage from a neighboring business, and CRUZ HERNANDEZ's driver's license photo, I believe the individual who dropped off the parcel is CRUZ HERNANDEZ. Specifically, the footage depicts that on May 17, 2023, CRUZ HERNANDEZ arrived at Global Cargo Norte in a BMW X2 and found the door locked.<sup>18</sup> CRUZ HERNANDEZ began looking at his phone, switched phones with a second phone he had in his pocket, and made a call. According to statements from Global Cargo Norte employees, CRUZ HERNANDEZ called the storefront and was directed to leave the parcel with the bakery next door. CRUZ HERNANDEZ left the parcel with the bakery and provided a new alias of "Pedro Rios Cruz" and an unrelated address and phone number. I

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<sup>17</sup> Based on my review of GPS cell-site data for the 2129 number, on May 6, 2023, CRUZ HERNANDEZ also was communicating with cell towers in a way consistent with travel to Redwood City, California, where it communicated with cell towers in the vicinity of Global Cargo Norte for approximately one hour. Based on my training and experience, I believe CRUZ HERNANDEZ was likely trying to identify shipping locations for the next shipment.

<sup>18</sup> My review of California DMV records indicates that neither CRUZ HERNANDEZ nor his significant other have a BMW registered in their names. No BMW is registered to any resident of the Floral Avenue address, believed to be CRUZ HERNANDEZ's residence, as explained below.

also compared the May 17<sup>th</sup> Global Cargo CCTV footage to the April 5<sup>th</sup> Paqueteria Latina CCTV footage, which appear to depict the same person.

44. Based on my training and experience, I know individuals engaged in firearms trafficking often use fictitious names, unrelated or fictitious addresses, fictitious phone numbers, and drive rental cars or borrow other individuals' cars to maintain anonymity and evade law enforcement detection. I also know that individuals engaged in firearms trafficking and other criminal activity often carry multiple phones, one of which is used for non-illicit contacts such as family and is more likely to be traceable to the individual. The other phone is often untraceable, subscribed in a fictitious name, or with no subscriber information at all. This second phone is used for illicit contacts and illegal activity where the individual wants to maintain anonymity. Based on my training and experience, CRUZ HERNANDEZ switched to a second phone to contact Global Cargo Norte in order to conceal his identity and relationship to the parcel, given its contents.

45. On June 13, 2023, I obtained a federal warrant for historical and prospective cell-site information signed by the Honorable Karen L. Stevenson, United States Magistrate Judge, for phone number 916-869-2129 (the "2129 number"), believed to

be used by CRUZ HERNANDEZ, as explained below.<sup>19</sup> See 2:23-MJ-03011.

46. Based on my review of GPS cell-site data for the 2129 number, on May 17, 2023, that cell phone was communicating with cell towers in a way consistent with travel to Redwood City, California, where it communicated with cell towers in the vicinity of Global Cargo Norte that same day.

47. AT&T records indicated that the 2129 number is subscribed to C.R.G. at the Floral Drive Address, where CRUZ HERNANDEZ appears to reside, based on the DMV registration of the black Ford, surveillance, and cell site data. I believe that C.R.G. is CRUZ HERNANDEZ's significant other because according to Accurant, she resides with CRUZ HERNANDEZ at the Floral Drive address, and according to my review of law enforcement databases, on February 5, 2008, CRUZ HERNANDEZ was voluntarily returned to Mexico with a group that included C.R.G. Moreover, on July 5, 2023, at approximately 6:10 A.M., HSI Sacramento SA Laqwon Perryman saw CRUZ HERNANDEZ leave the Floral Drive address in a Nissan sedan registered in his and C.R.G.'s names.

48. According to my analysis of AT&T GPS cell-site data of the 2129 number, on the evening of May 16, 2023, that cell phone communicated with towers in a way consistent with travel from the Floral Drive address (CRUZ HERNANDEZ' residence) to the

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<sup>19</sup> According to Western Union, CRUZ HERNANDEZ used the 2129 number when receiving wire transfers from Mexico as recently as April 2023. Western Union requires valid photo identification to pick up wired funds.

Shields Avenue address (CRUZ RAMOS' residence) in Sanger, California, before communicating with cell towers in a manner consistent with travel from Sanger to Redwood City, California, where as previously mentioned, CRUZ HERNANDEZ dropped off a parcel later found to contain AR-15-style rifles at Global Cargo Norte.

49. Conversely, HSI Sacramento surveillance photographs also indicate that on June 23, 2023, CRUZ RAMOS remained at CRUZ HERNANDEZ's residence for less than an hour and exited the residence carrying a white garbage bag filled with unknown items.

**H. CRUZ RAMOS Sends Another Parcel with Five AR-15-style Rifles from Los Angeles, California on June 14, 2023**

50. According to my review of pole camera footage from around the Shields Avenue address and confirmed by GPS cell-site data for the 5939 number, on June 14, 2023, CRUZ RAMOS, using the black Honda, departed the Shields Avenue address at approximately 5:45 a.m. The 5939 number communicated with several cell phone towers from Sanger, California to Los Angeles, California starting at approximately the same time. Following the GPS cell-site data in real time, near Santa Clarita, California, I, along with other HSI SAs and Task Force Officers ("TFOs"), initiated surveillance of CRUZ RAMOS in the black Honda along Interstate 5 on its way into Los Angeles.

51. At approximately 11:45 a.m., I saw CRUZ RAMOS exit the black Honda and carry a large, heavily taped box into C&J

Express ("C&J"), a shipping service in downtown Los Angeles.<sup>20</sup> I saw MONTANO JIMENEZ exit the black Honda and walk behind CRUZ RAMOS to the doorway of C&J, and then return to the vehicle to wait.<sup>21</sup> CRUZ RAMOS left C&J without the parcel, got into the black Honda, and departed the area.

52. According to my review of C&J records and conversations with their employees, CRUZ RAMOS dropped off an 18" by 18" by 27" box for shipment to Oaxaca, Mexico (the "June 14<sup>th</sup> parcel"). The invoice listed a Oaxacan recipient address and Mexican phone number from previously seized parcels with a new recipient name of "Marciana Pacheco Vazquez." CRUZ RAMOS provided C&J Express with the name "Ivan Martinez" and the 5939 number, both in person at the storefront and on the phone with the C&J call center. On June 15, 2023, a trained gun detection dog, Traxx, alerted positively to the parcel for the presence of guns.

53. On June 15, 2023, I obtained a federal search warrant signed by the Honorable Karen L. Stevenson, United States Magistrate Judge, for the June 14, 2023 C&J Express parcel believed to contain firearms. See 2:23-MJ-03068. On the same

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<sup>20</sup> C&J Express is a store-front and customer pick up mailing service that uses H&R Logistics, also located in downtown Los Angeles, to consolidate parcels and deliver them to Mexico.

<sup>21</sup> Based on my conversations with colleagues participating in the surveillance, I know that CRUZ RAMOS and MONTANO JIMENEZ's minor male son was in the vehicle with them, as they stopped to eat at a roadside food stand prior to arriving at C&J.

date, I executed the search warrant and found five AR-15-style rifles concealed in foil, tape, and clothing within the parcel.<sup>22</sup>

**I. CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ  
Conspired with Each Other, and Others Known and  
Unknown, to Traffic AR-15-Style Rifles to Mexico in  
Exchange for Money**

54. According to my analysis of AT&T call records, the 8093 number, believed to be used by CRUZ RAMOS, had 271 contacts with the 2129 number, believed to be used by CRUZ HERNANDEZ, between February 1, 2023 and May 30, 2023, including six contacts on the date of the April 5, 2023 shipment.<sup>23</sup> The 2129 number was the 8093 number's most frequent contact during that period. The 5939 number, also believed to be used by CRUZ RAMOS, had 50 contacts with the 2129 number between June 4, 2023 and June 18, 2023.<sup>24</sup>

55. More specifically, on April 5, 2023, the 2129 number communicated with cell phone towers near the Shields Avenue address (i.e., CRUZ RAMOS's residence) until approximately 5:50 a.m., when the 2129 number began communicating with cell phone towers from the Sanger, California area down to Canoga Park, California. The 2129 number landed near Canoga Avenue and Sherman Way in Canoga Park, California at approximately 9:05 a.m. As previously explained, on April 5, 2023, a person

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<sup>22</sup> Currently, the CBP Laboratory is processing the packaging material for latent prints, and processing has not been completed.

<sup>23</sup> According to AT&T GPS cell-site data, phone -8093 was no longer active as of June 1, 2023.

<sup>24</sup> According to AT&T records and GPS cell-site data, CRUZ RAMOS appeared to have acquired a new prepaid phone on June 15, 2023.

appearing to be CRUZ HERNANDEZ dropped off parcels later found to contain AR-15-style rifles at Paqueteria Latina at Canoga Avenue and Sherman Way in Canoga Park, California. The 2129 number appeared to communicate with towers in a manner consistent leaving Canoga Park at approximately 10:20 a.m. and arriving in downtown Los Angeles, California. The 2129 number then communicated with cell phone towers between Los Angeles, California and Sanger, California, near the Shields Avenue address, before returning to the North Highlands, California area (i.e., the vicinity of the Floral Drive address believed to be CRUZ HERNANDEZ' residence).

56. According to my analysis of AT&T GPS cell-site data and Paqueteria Latina records, the 2129 number also appeared to communicate with cell towers in a way consistent with travel to CRUZ RAMOS's residence prior to sending parcels on other occasions:

a. On December 8, 2022, prior to sending a parcel from Paqueteria Latina in Canoga Park, California;

b. On December 9, 2022, prior to sending a parcel on December 11, 2023 from Paqueteria Latina in Richmond, California;<sup>25</sup>

c. On January 15, 2023, prior to sending a parcel on January 16, 2023 from Paqueteria Latina in Redwood City, California;

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<sup>25</sup> According to Paqueteria Latina records, CRUZ HERNANDEZ used the same recipient addresses and phone numbers on the December 11<sup>th</sup> parcels as on other parcels found to contain AR-15-style rifles.



d. On February 25, 2023, prior to sending a parcel on February 27, 2023 from Paqueteria Latina in Redwood City, California. (Before continuing to Redwood City, the 2129 number appeared to return to the vicinity of the Floral Drive address, i.e., CRUZ HERNANDEZ' residence on February 26, 2023.)

57. According to my analysis of AT&T GPS cell-site data, the 8093 number, believed to be used by CRUZ RAMOS, communicated with cell towers in a manner consistent with travel to CRUZ HERNANDEZ's residence on April 1, 2023 and June 23, 2023. As previously mentioned, HSI Sacramento surveillance photographs also indicate that on June 23, 2023, CRUZ RAMOS remained at CRUZ HERNANDEZ's residence for less than an hour and exited the residence carrying a white garbage bag filled with unknown items.

58. According to my review of Western Union, MoneyGram, and Ria financial records, CRUZ RAMOS, CRUZ HERNANDEZ, MONTANO JIMENEZ, C.R.G., and others known and unknown have received a steady influx of wire transfers from Oaxaca, Mexico since at least January 2022 to the present, totaling approximately \$100,000. The Mexico-based individuals made large payments to CRUZ RAMOS, MONTANO JIMENEZ, CRUZ HERNANDEZ, and other co-conspirators by breaking up large payments into multiple smaller payments spread across multiple individuals--i.e., structuring. For example, on March 27, 2023, a few days after the March 15 shipments, A.E.C.H. wired \$1,265.56 to CRUZ HERNANDEZ at 11:48 a.m., for pick up at Wal-Mart #1881, and another for \$759.37 to CRUZ HERNANDEZ four minutes later, for pick up at Wal-Mart

#4393.<sup>26</sup> On the same date, R.C.H. sent \$1,594.64 to CRUZ HERNANDEZ's significant other, C.R.G., at 6:41 p.m., for pick up at Wal-Mart #1881. CRUZ HERNANDEZ and his significant other received a total of \$3,619.57 from Mexico that day.

57. Based on my training and experience, individuals engaged in firearms trafficking or the trafficking of other contraband receive payments from recipients through a variety of means. When cash payment is used, and wires are sent, individuals will structure transactions and disperse them over multiple co-conspirators to evade law enforcement detection. CRUZ HERNANDEZ received two wires from the same individual at two separate Wal-Mart stores near his residence, and his significant other received a third sent on the same day, indicating a significant payment.

58. According to my review of law enforcement databases, I could not locate work permits, social security numbers, or valid employment for CRUZ RAMOS, CRUZ HERNANDEZ, MONTANO JIMENEZ, C.R.G., or other co-conspirators, although they own large properties and newer model vehicles.

59. Based on my training and experience and the information above, I believe CRUZ RAMOS may be the source of supply of firearms for CRUZ HERNANDEZ and MONTANO JIMENEZ, and that CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ are conspiring with each other and others to ship AR-15-style rifles

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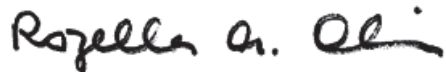
<sup>26</sup> According to MoneyGram records, Wal-Mart #1881 is located at 7901 Watt Avenue, Antelope, California, and Wal-Mart #4393 is located at 4675 Watt Avenue, North Highlands, California. The two locations are approximately 5 miles apart.

to Oaxaca, Mexico, in exchange for financial compensation paid either directly to them or through family members.

**V. CONCLUSION**

60. For all the reasons described above, there is probable cause to believe that CRUZ RAMOS, CRUZ HERNANDEZ, and MONTANO JIMENEZ have violated 18 U.S.C § 371 (Conspiracy to Traffic Firearms).

Subscribed to and sworn before me  
this 18<sup>th</sup> day of July, 2023.



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HONORABLE ROZELLA A. OLIVER  
UNITED STATES MAGISTRATE JUDGE